**Indiana Department of Natural Resources** Division of Forestry State Forest Resource Management Guide Public Comment Summary

## **Jackson Washington State Forest Compartment 4 Tract 5** 30 Day Comment Period Ending: 6/11/2015 Comments Received: 2

The table below is a summary of public comments received concerning the draft Resource Management Guide (DRMG). The public comments received have been reviewed in their entirety and given due consideration summarized in the Division of Forestry response below.

## **Division of Forestry Response Comment Summary** Indiana State Forests contain approximately 1.15 billion Opposes commercial harvesting in this tract. Cites concerns on board feet of timber. Managed harvest levels on State overall State forest harvest levels and proposed level and cycle for this tract. Forests are set at a level to insure long term sustainability. These levels are periodically reviewed as new inventory data Concern of potential impact to wildlife habitats, and potentially to endangered/threatened species. is collected. See http://www.in.gov/dnr/forestry/files/fo-State Forest CFI Report 2010 2014.pdf. The inventory cycle Commenter would like more details than provided in the guide as it relates to resource inventories and assessments. is not the same as the harvest cycle. A tract will be re-Commenter would also like more information as it relates to RTE inventoried every 20-30 years. At that time a determination will species. Recommends comprehensive inventory of birds and be made as to whether the tract is ready for any type of wildlife be conducted before plan implementation. management. Concern on potential for soil erosion and sedimentation and the The management guide provides an overview of wildlife and effective implementation of BMPs. Would like more detail on timber resources. Further information on direct and indirect forestry BMPs to be utilized. impacts on species and habitats are found in the Indiana State Would like comment period to be longer than 30 days. Forest Environmental Assessment. Opposes prescribed timber harvest, stating State Forests should http://www.in.gov/dnr/forestry/files/fo-StateForests EA.pdf be preserved from harvests as much as possible. Cites general concerns on impacts to climate change, environmental pollution, Habitats, communities and wildlife species are considered as wildlife, invasive species, forest ecosystems, and aesthetics. part of the management planning process. Along with field Concern on management approach for wildlife legacy trees, observations, Natural heritage data has been reviewed to check snags and cavity trees. Recommends no tree cutting. Refers to and recommends the Forest Management Guidelines issued by for threatened or endangered bird and wildlife species on or the USFWS for Indiana bat. near the management unit. The locations of RTE species are Concerned about the utilitarian philosophy and terminology

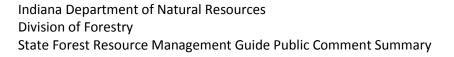
protected as such their presence or locations are not disclosed

used to describe trees and forest conditions and that full range of values are not considered.

- Concern that the RMG calls for the removal of all American Sycamore and Sassafras. Questions the ecological value of oak species relative to other species.
- Concern on impacts to species diversity, forest resiliency and genetic diversity.
- Concern on potential spread of invasive species as result of management activity
- Concern RMG does not address impacts on climate change and carbon sequestration. Suggests DoF put in place evaluation standards to consider the cumulative impacts of all state and federal forest management projects across the state.

in the RMG.

- While Sycamore and Sassafras was tallied as harvest stock during inventory assessments, its complete harvest is not proposed. Tree selection is based on many parameters in addition to species.
- The 30 day public comment period will remain as standard procedure. However, if individuals have information that is pertinent and specific to the tract they can present that information at any time.
- Assessing climate change and carbon sequestration is beyond the scope of tract level RMGs.
- Best management practices will be implemented and monitored to address the soil erosion and sedimentation concerns. BMPs will be required of operator and included in timber sales contracts. DoF will respond to reported BMP departures. BMP guidance can be found at: <a href="http://www.in.gov/dnr/forestry/files/fo-2005">http://www.in.gov/dnr/forestry/files/fo-2005</a> Forestry BMP Field Guide.pdf
- Invasive species presence and control needs will be monitored as part of normal operations. A variety of management measures are considered in an overall integrated pest control strategy, including manual controls, defensive plantings and treatments with approved herbicides. Strictly manual measures are seldom effective control strategies by themselves.
- State Forest operations adhere to a comprehensive set of forest certification standards (FSC & SFI) to insure long term



- forest sustainability. Operations are subject to annual 'third party' audits to insure compliance to these standards.
- Implementation of the RMG will utilize guidance from the US Fish and Wildlife Service and other sources to avoid take impacts to the Indiana and other listed bat species.
- The RMG uses forest terminology which integrates many considerations including biological, human utility and more.
  The scope of considerations are not always fully portrayed by the terminology
- The prescribed management activities are consistent with silvicultural principles, promotes habitat diversity and supported by inventory data and field assessments. The concerns expressed have been considered and may be further addressed during plan implementation.